

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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GOVERNMENT EMPLOYEES INSURANCE
COMPANY, GEICO INDEMNITY COMPANY,
GEICO GENERAL INSURANCE COMPANY, and
GEICO CASUALTY COMPANY,

C.A. No. 20-cv-3495 FB/SJB

Plaintiffs,

vs.

ALEXANDER ZAITSEV, M.D., METROPOLITAN
INTERVENTIONAL MEDICAL SERVICES, P.C.,
ANTHONY BENEVENGA, CHARLES G. NICOLA,
D.C., RIDGEWOOD DIAGNOSTIC LABORATORY,
L.L.C., TRI-STATE MULTI-SPECIALTY MEDICAL
SERVICES, P.C., RIVERSIDE MEDICAL
SERVICES, P.C., KRISTAPPA SANGAVARAM,
M.D., ALLAN WEISSMAN, M.D., EUGENE
GORMAN, M.D., BOGDAN NEGREA, M.D.,
ANTONIO CICCONE, D.O., STELLA AMANZE,
P.A., FRIDA ISAKOV, P.A., LUCKNIE OVINYC,
P.A., EMILY BAKERMAN, N.P., MELISSA EVANS,
N.P., MINI MATHEW, N.P., ANGELA PULLOCK,
N.P., LINDA SANTA MARIA, N.P., RIVKA WEISS,
N.P., CROSSTOWN MEDICAL, P.C., and WILLIAM
FOCAZIO, M.D.,

Defendants.

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DEFENDANT'S SUGGESTION OF BANKRUPTCY

PLEASE TAKE NOTICE that on January 15, 2019, defendant William J. Focazio, MD, filed a voluntary petition in the United States Bankruptcy Court for the District of New Jersey for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") in the case In re William J. Focazio, Case No. 19-10880. A copy of the voluntary petition is attached as Exhibit "A."

PLEASE TAKE NOTICE that pursuant to section 362(a) of the Bankruptcy Code, the Debtor's filing of his voluntary petition operates as a stay, applicable to all entities, of, among other things: (a) the commencement or continuation of all judicial, administrative, or other actions

or proceedings against the Debtor (i) that were or could have been commenced before the commencement of the Debtor's case or (ii) to recover any claims against the Debtor that arose before the commencement of the Debtor's case; (b) the enforcement, against the Debtor or against any property of the Debtor's bankruptcy estates, of a judgment obtained before the commencement of the Debtor's cases; or (c) any act to obtain possession of property of or from the Debtor's bankruptcy estate, or to exercise control over property of the Debtor's bankruptcy case.

PLEASE TAKE NOTICE that Crosstown Medical, P.C., is 100% owned by and is an asset of Dr. Focazio's individual bankruptcy case.

PLEASE TAKE NOTICE that on January 13, 2018, William Focazio, MD, PA ("MD PA"), filed a voluntary petition in the United States Bankruptcy Court for the District of New Jersey for relief under chapter 11 of title 11 of the Bankruptcy Code in the case In re William Focazio, MD, PA, Case No. 18-10752. The defendant, William J. Focazio, is the 100% owner of MD PA. A copy of the voluntary petition is attached as Exhibit "B."

PLEASE TAKE NOTICE that on January 13, 2018, Endo Surgical Center of North Jersey ("Endo Surgical") filed a voluntary petition in the United States Bankruptcy Court for the District of New Jersey for relief under chapter 11 of title 11 of the Bankruptcy Code in the case In re Endo Surgical Center of North Jersey, Case No. 18-10753. The defendant, William J. Focazio, is the 100% owner of Endo Surgical. A copy of the voluntary petition is attached as Exhibit "C."

Dated: December 22, 2020

/s/
Keith J. Singer